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February 22, 2006

Via Electronic Delivery

Ms. Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation

Dear Ms. Dortch,

On Tuesday, February 21, 2006, Ms. Caressa D. Bennet, Mr. Kenneth C. Johnson of Bennet & Bennet, PLLC, representing the Rural Telecommunications Group, Inc. ("RTG"), Mr. David Fauske of Arctic Slope Telephone Association Cooperative, Mr. Jamey Wigley of Central Texas Communications, Inc., Mr. Bill Wade and Mr. Gerry Anderson of Mid-Rivers Communications, Inc., Mr. Glenn Ishihara of NTCH, Inc. d/b/a ClearTalk, Mr. Gary Burke of Panhandle Telephone Cooperative, Mr. Mike Higgins and Mr. Bill Woods of CT Cube, Inc., and Mr. John Johnson, also on behalf of RTG, held a conference call with David Furth, John Branscome, Gary Michaels, Erik Salovaara, Martha Stancill, Nese Guendelsberger, Kelly Quinn and Paul D'Ari of the Federal Communications Commission's ("FCC" or "Commission") Wireless Telecommunications Bureau.

RTG members expressed their concern over so-called "blind bidding" in the upcoming AWS-1 auction, consistent with RTG's comments in this proceeding. Ken Johnson mentioned how most of the wireless industry was opposed to blind bidding and how important it was for rural carriers to know who their potential neighbors would be due to roaming and other technical issues. Specifically, Glenn Ishihara said that his company had to know who the carriers adjacent to their territory would be before committing "real money" in an auction. With blind bidding, Glenn added, it was unlikely that his small, entrepreneurial company would be able to participate in the AWS-1 auction. He predicted that other similarly-situated companies would feel the same way. Mike Higgins mentioned how his company had lost out in prior auctions to larger carriers and how he was anxious to acquire spectrum in this auction. Unfortunately, the proposed use of blind bidding would handicap his company's effort. Mike Higgins stated that knowing who adjacent roaming partners might be was a "primary" business and bidding concern of rural companies.

Caressa Bennet said that it was crucial for the AWS-1 auction to commence on June 29, 2006 as planned. She said that small carriers were caught off guard by the package bidding proposal and encouraged the Commission to abandon this proposal for the June 29, 2006 AWS-1 auction. She added that the prospect of monitoring two simultaneous auctions would tax the

resources of small carriers, making rural participation more complex than necessary, contrary to the principles of Section 309(j) of the Communications Act of 1934, as amended.

RTG also discussed bidding credits available to designated entities (DEs) and the Council Tree proposal to prohibit DE status to certain carriers with "material relationships" to larger wireless entities. RTG noted that it generally supports the Council Tree proposal if it can be implemented in time for the June 29, 2006 AWS-1 auction. RTG expressed that it was a paramount concern of theirs that the auction commence on time. RTG said that it would be filing comments in this proceeding to further explain its position on DEs.

Ken Johnson discussed the comments filed in the automatic roaming proceeding and suggested that there was a dichotomy between the generally competitive retail/consumer Commercial Mobile Radio Service (CMRS) market and the wholesale/carrier roaming market. He also stated that the Section 208 process, absent a definitive rule regarding mandated automatic roaming, was not an effective tool to stop abuses by large carriers of their market positions with regards to roaming. Caressa Bennet discussed the need for the Commission to use its authority to examine generally confidential roaming agreements in order to gather evidence of carrier abuses.

Finally, RTG discussed the status of its 700 MHz band plan proposal in light of recent legislation.

Pursuant to Section 1.1206(b) of the Commission's Rules, this letter is being filed electronically. Please refer any questions regarding this matter to the undersigned counsel.

Best regards,

/s/

Kenneth C. Johnson

cc: David Furth, FCC
Kelly Quinn, FCC
Gary Michaels, FCC
Erik Salovaara, FCC
John Branscome, FCC
Martha Stancill, FCC
Nese Guendelsberger, FCC
Paul D'Ari, FCC